

## Talking points

- Annie Hill is also part of Hilcorp
- It is a tank battery facility (in chunchula AL) that gets gas from 3 wells that goes through a heater treater, the condensate gets stored in the tanks which are eventually trucked to Hatters Pond, the clean gas gets compressed and re-injected back into the well
- During the inspection on August 16, 2017 the FLIR camera was used and saw emissions continuously leaking from the Pressure Relief Device connected to both of the condensate tanks
- From the gas analysis we received from the company it shows the emissions from the storage tanks is composed of mainly VOCs
- This facility has a VRU and was running at the time the FLIR noticed the emissions.
- The tanks were not loading nor unloading at the time of our inspection
- The condensate tanks are subject to NSPS Subpart OOOOa which require storage vessels that have a control device route all emissions from the storage tanks to the control device
- We believed they violated OOOOa along with the NSPS General Provisions which require facilities to be maintained and operated **in a manner consistent with good air pollution control practice for minimizing emissions, given that the PRD was leaking consistently that is not good practice for minimizing emissions**
- **We are writing an AO to collect releases\*\***
- **We are proposing an AO to require the facility to take the**
  - necessary steps to prevent the release of VOCs from the storage tanks, including fixing, repairing, or replacing the components that led to the documented releases so that Hilcorp will be in compliance
- VRu has capacity to extract
- PRD, if the pressure is too high for the VRU then the PRD is to release the pressure so it doesn't become over pressurized and dangerous or if VRU is broken
- Draw
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- There was another piece of equipment the FLIR found emissions leaking. It was leaking from a capped fuel scrubber that is currently just being used as piping to transport sweet gas. We believe that may be part of our LDAR program but we need more information so we are going to send a 114 to get more information from the LDAR program

Cite c1 and c2

Standards of Performance for Crude Oil and  
Natural Gas Facilities for which Construction,  
Modification or Reconstruction Commenced After  
September 18, 2015